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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE §
§
SUPERIOR AIR PARTS, INC., § CHAPTER 11
§ CASE NO. 08-36705-BJH-11
DEBTOR. §

AGREED MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

COME NOW, Superior Air Parts, Inc. (“Superior”), and Dr. Bruno Kübler (“Kübler”), as insolvency administrator of Thielert Aircraft Engines GmbH (“TAE”) (collectively, the “Parties”) and hereby file this Agreed Motion for Entry of Agreed Protective Order. In order to effectively further discovery and settlement negotiations relating to Superior’s Motion to Enforce [Dkt. 684], the Parties request that the Court enter the Agreed Protective Order attached hereto as **Exhibit “A”** and uploaded separately for entry, such that documents believed by either Party to be confidential can be immediately produced.

Respectfully submitted,

PASSMAN & JONES, P.C.

By: /s/ Christopher A. Robison

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**COUNSEL FOR DR. KUBLER, IN HIS
CAPACITY AS INSOLVENCY
ADMINISTRATOR OF THIELERT
AIRCRAFT ENGINES GMBH**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served via First Class U.S. Mail, postage prepaid, and/or via electronic mail, to counsel for Dr. Kubler on this, the 7th day, of April 2014.

/s/ Christopher A. Robison

Christopher A. Robison

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE §
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SUPERIOR AIR PARTS, INC., § CHAPTER 11
§ CASE NO. 08-36705-BJH-11
DEBTOR. §

AGREED PROTECTIVE ORDER

The Court considered the request of Superior Air Parts, Inc. (“Superior”), and Dr. Bruno Kübler (“Kübler”), as insolvency administrator of Thielert Aircraft Engines GmbH (“TAE”) (collectively, the “Parties”) for an Agreed Protective Order protecting the confidentiality of information to be produced by the Parties in connection with Superior’s Motion to Enforce [Dkt. 684], and after having considered the request and the agreement of the Parties, the Court hereby ORDERS:

1. That the following definitions shall apply to this Order:

a. “*Confidential Information*” shall mean documents or other tangible items which are designated and/or marked by any Party as “*CONFIDENTIAL*,” and any other information ordered to be produced and determined to be confidential by the Court. Confidential Information expressly includes design and test data, .pdf drawings labeled as “Superior Air Parts, Inc. Dallas, Texas,” and data files in the possession of TAE or Kübler containing the following extensions: .asm, .prt, .drw, .stp, .igs, .step, or .x_t.

b. “*Qualified Persons*” shall mean: the Parties and their employees, agents and representatives, attorneys for the Parties, including all partners, associate attorneys, clerks, paralegal assistants and secretaries operating under the direct supervision of such partners or their associate attorneys, whose knowledge is essential to the Motion to Enforce, consultants and expert witnesses, and outside vendors utilized by the Parties and/or their counsel in connection with the Motion to Enforce.

2. That Confidential Information shall be designated and/or marked by the Party producing it as “*CONFIDENTIAL*.”

3. That Confidential Information shall be used only in connection with the pending Motion to Enforce and shall not be disclosed or used for any other purpose without further order of the Court.

4. That Confidential Information, including the substance or content of the confidential information, as well as all notes and memoranda relating thereto, shall not be disclosed to anyone other than a Qualified Person.

5. That Confidential Information shall be maintained under the supervision of a Qualified Person at all times.

6. That the prohibitions of this Protective Order do not apply to either Party's use of its own Confidential Information in the course of its own business or as otherwise required by law or Court order. A designation of Confidential Information by a Party, or the absence of such a designation, shall not be dispositive or relevant concerning any issue in dispute between the Parties, and neither Party may offer evidence of such designation or absence thereof in connection with the merits of the Motion to Enforce.

END OF ORDER

Submitted by:

PASSMAN & JONES, P.C.

/s/ Christopher A. Robison

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